

1 **REMARKS**

2 Claims 1-13, 41-50, 82-92, 98-101, and 103 are pending for consideration.  
3 In view of the following remarks, Applicant respectfully requests that this  
4 application be allowed and forwarded on to issuance.  
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6 **Discussion Summary**

7 Applicant wishes to thank Examiner Rachna Singh for conducting a  
8 telephonic interview with Applicant's attorney, Michael Colby, on June 26<sup>th</sup>, 2007.

9 During the interview, Applicant's attorney submitted differences between  
10 the references and the claimed subject matter, including that neither reference,  
11 alone nor in combination, teaches treating an enter key typed into a cell as  
12 meaning a return command if the cell is interpreted as primarily word-processing  
13 based or as meaning a command to navigate to another cell if interpreted as  
14 primarily spreadsheet based.

15 The Examiner noted that she did not issue this Action but that the case was  
16 transferred to her after the Action was already completed by the prior examiner  
17 (Paul Nguyen Ba). The Examiner agreed to carefully consider Applicant's  
18 argument once submitted in writing and call Applicant's attorney once she has a  
19 chance to more-fully consider the rejections and Applicant's argument.

20 Therefore, Applicant submits its argument in writing herein as discussed in  
21 the interview.  
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23 **Claim Rejections under 35 U.S.C. 103**

24 Claims 1-13, 41-50, 82-92, 98-101, and 103 stand rejected under  
25 35 U.S.C. 103(a) as being obvious over Laura Acklen & Read Gilgen (hereinafter

1 “Acklen”), Using Corel WordPerfect 9, 251-284, 424-434, 583-586 (1998) in view  
2 of Webopedia Computer Dictionary (hereinafter “Webopedia”), pages 1-7 (and  
3 newly added supplemental page 1 only for claims 1-13, 41-43, 82-92, 98, and  
4 103).

5  
6 Applicant notes that all of the independent claims recite the following  
7 language: “*treating an enter key typed into the cell as meaning a return*  
8 *command if the cell is interpreted as primarily word-processing based or as*  
9 *meaning a command to navigate to another cell if interpreted as primarily*  
10 *spreadsheet based*” except for claim 41, which includes similar limitations. In  
11 making out the rejections of all of the independent claims, the Office argues that  
12 most of the language in the claims is anticipated by Acklen (“Using Corel  
13 WordPerfect”). The Office admits, however, that Acklen does not teach or  
14 suggest: “The functions comprising treating an *enter key* typed into the cell as  
15 meaning a *return command* *if the cell is interpreted as primarily word-*  
16 *processing* based or as meaning a *command to navigate* *to another cell if*  
17 *interpreted as primarily spreadsheet* based.”

18 The Office argues, however, that this language is rendered obvious by  
19 combining Acklen with Webopedia’s definition of “Enter Key.” Specifically, the  
20 Office states that Webopedia discloses that the “Enter key has a duality of  
21 functions: (i) return key, or (ii) moves cursor to the next field.” (See Office  
22 Action, page 5.) The Office then argues that “since both references are from the  
23 same field of endeavor, the express motivational purpose of streamlining and  
24 making more efficient a key by allowing dual functions on said key as disclosed  
25 by Webopedia would have been recognized in the pertinent art of Acklen.”

Applicant respectfully disagrees with the Office and submits that the Office has failed to make out a *prima facie* case of obviousness. First, in order to assist the Office in understanding the novelty of treating an *enter key* typed into the cell as meaning a *return command if the cell is interpreted as primarily word-processing* based or as meaning a *command to navigate to another cell if interpreted as primarily spreadsheet* based, Applicant has reproduced an excerpt from Applicant's specification:

**Applicant's Specification, Page 27**

**Key Processing**

Certain keys have different interpretations depending upon the contents of the cell. This dynamic interpretation *accommodates the competing interests of a word processing table and a spreadsheet*. As an example, the "Enter" key typically means return in word processing, whereas it means move to the next cell in a spreadsheet program.

If the cell contains text (e.g., cells A1-A6, B1-B5, and C1 in Fig. 3), the architecture interprets this cell as primarily being a word processing-based cell and treats the keys as if the user were working within a word processing application. Thus, an "Enter" key means return, a "tab" key means tab over some distance, the "=" key typed in anywhere but the beginning of the cell means the equals symbol without denoting a formula, and so forth.

If the cell contains a formula or a data value (e.g., cells C2-C6 in Fig. 3), the architecture interprets this cell as primarily being a spreadsheet-based cell and treats the keys as if the user were working within a spreadsheet application. Thus, an "Enter" key and "tab" key mean navigation commands to move to the next cell, the "=" key at the beginning of a cell implies the start of a formula, and so forth.

As the Office noted, it is commonly known that the enter key performs different functions depending on whether it is used in a word processing document or a spreadsheet document. The novelty claimed by Applicant, however, includes the ability to (1) determine whether a cell is primarily a "word processing" cell or a "spreadsheet" cell, and then (2) when the enter key is pressed perform different

1 commands depending on whether the cell is word processing or spreadsheet based.  
2 There is simply no mention in Acklen of a need or desire to treat an *enter key*  
3 typed into the cell as meaning a *return command if the cell is interpreted as*  
4 *primarily word-processing* based or as meaning a *command to navigate to*  
5 *another cell if interpreted as primarily spreadsheet* based.

6 Thus, the only way that Webopedia's definition of "enter" could be  
7 combined with Acklen is if one were to use Applicant's specification as a template  
8 to piece together the two pieces of prior art. This is known as "hindsight"  
9 reasoning, and is not allowed in making out a *prima facie* case of obviousness.

10 For the reasons given above, the Office has failed to make out a *prima facie*  
11 case of obviousness for any of the independent claims. Accordingly, all of the  
12 independent claims are allowable. Furthermore, all of the dependent claims are  
13 also allowable because they depend from an allowable independent claim and for  
14 their own recited features.

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**Conclusion**

Claims 1-13, 41-50, 82-92, 98-101, and 103 are in condition for allowance. Applicant respectfully requests reconsideration and prompt allowance of the subject application. If any issue remains unresolved that would prevent allowance of this case, the Examiner is requested to contact the undersigned attorney to resolve the issue.

Respectfully submitted,

Dated: 28 June 2007

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